

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**SOVEREIGN PEAK VENTURES, LLC,**

**Plaintiff,**

**V.**

**TCL TECHNOLOGY GROUP  
CORPORATION,  
TCL INDUSTRIES HOLDINGS CO.,  
LTD.,  
TCL ELECTRONICS HOLDINGS LTD.,  
TCL COMMUNICATION  
TECHNOLOGY HOLDINGS LTD.,  
HUIZHOU TCL MOBILE  
COMMUNICATION CO. LTD.,  
TCT MOBILE WORLDWIDE LTD.,  
TCT MOBILE INTERNATIONAL LTD.,  
SHENZHEN TCL NEW TECHNOLOGIES  
CO. LTD.,  
TCL KING ELECTRICAL APPLIANCES  
(HUIZHOU) CO. LTD.,  
TCL MOKA INTERNATIONAL LTD.,  
and  
TCL MOKA MANUFACTURING S.A.  
DE C.V.,**

## Defendants.



## JURY TRIAL DEMANDED

**C.A. NOS. 2:21-CV-00006-JRG  
2:21-CV-00007-JRG  
2:21-CV-00008-JRG**

**JOINT AGREED MOTION TO EXTEND THE TIME TO ANSWER OR  
OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF’S COMPLAINT  
AND WAIVER OF FOREIGN SERVICE REQUIREMENT**

Plaintiff Sovereign Peak Ventures, LLC (“SPV”) and Defendants TCL Technology Group Corporation, TCL Industries Holdings Co., LTD., TCL Electronics Holdings LTD., TCL Communication Technology Holdings LTD., Huizhou TCL Mobile Communication Co. Ltd., TCT Mobile Worldwide LTD., TCT Mobile International LTD., Shenzhen TCL New Technologies

Co. Ltd., TCL King Electrical Appliances (Huizhou) Co. Ltd., TCL Moka International Ltd., and TCL Moka Manufacturing S.A. DE C.V. (collectively, “Defendants”) jointly move the Court to extend the time within which Defendants are each required to answer or otherwise respond to SPV’s Complaint in each of the above-referenced actions by 120 days, which would be up to and including May 19, 2021.

Plaintiff and Defendants have been in contact related to this request, and have discussed the matter multiple times, as well as this extension, and believe it is appropriate particularly given the number of defendants in the cases, the size and complexity of these cases, coupled with the fact that all of the Defendants are foreign entities. SPV and Defendants agreed that Defendants, which are each a foreign corporation located outside the United States, each waive the service of process requirements under Federal Rule of Civil Procedure 4(h) and 4(f)(1) and each will not challenge service in exchange for a 120-day extension. Such a waiver and extension are made pursuant to Federal Rule of Civil Procedure 4(d)(3), which grants foreign defendants 90 days to answer in exchange for waiving service. Additional time was provided to accommodate the Defendants’ request.

Accordingly, the parties request that the Court grant the request for a 120-day extension for the Defendants to answer, up to and including May 19, 2021. The parties do not make this motion for purposes of delay, but for good cause such that the Court is not burdened with a procedural dispute.

Dated: February 9, 2021

Respectfully submitted,

/s/ Patrick J. Conroy

Patrick J. Conroy

Texas Bar No. 24012448

T. William Kennedy Jr.

Texas Bar No. 24055771

Jonathan H. Rastegar

Texas Bar No. 24064043

Jerry D. Tice, II

Texas Bar No. 24093263

**Bragalone Conroy PC**

2200 Ross Avenue

Suite 4500W

Dallas, TX 75201

Tel: (214) 785-6670

Fax: (214) 785-6680

pconroy@bcpc-law.com

bkennedy@bcpc-law.com

jrastegar@bcpc-law.com

jtice@bcpc-law.com

**Attorneys for Plaintiff**

**Sovereign Peak Ventures, LLC**

Respectfully submitted,

/s/ Bradford A. Cangro, with permission

Bradford A. Cangro (Admitted in TXED)

D.C. Bar No. 495996

**PV LAW LLP**

5335 Wisconsin Avenue, N.W.

Suite 440

Washington, D.C. 20015-2052

(202) 773-4112

bradford.cangro@pvuslaw.com

***Counsel for Defendants***

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel on February 9, 2021.

/s/ Patrick J. Conroy  
Patrick J. Conroy

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel in this case has complied with the meet and confer requirement set out in Local Rule CV-7(h). The motion is agreed to and submitted jointly.

/s/ Patrick J. Conroy  
Patrick J. Conroy